

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA  
HAMMOND DIVISION**

**UNITED STATES OF AMERICA**

**Plaintiff,**

**v.**

**CASE NUMBER: 2:06 CR 63**

**VIKRAM S. BUDDHI**

**Defendant.**

**MOTION TO CONTINUE THE DEADLINE  
FOR PRE-TRIAL MOTIONS UNDER FEDERAL RULE OF  
CRIMINAL PROCEDURE 12(b)**

Comes now the defendant, by counsel, and moves the court to continue the deadline imposed at the arraignment for pre-trial motions pursuant to Federal Rule of Criminal Procedure 12(b). In support of this motion, the defendant would show the following:

1. That the defendant was arraigned on April 26, 2006 before Magistrate Rodovich. At the arraignment, Magistrate Rodovich ordered that pre-trial motions pursuant to Federal Rule of Criminal Procedure 12(b) must be filed within thirty (30) days after the arraignment.

2. At the time of this filing, the government has provided limited discovery. The undersigned counsel has spoken with Assistant United States Attorney Phil Benson who has indicated that computer-based discovery will be provided following the government agents conducting their analysis.

3. The government has sought and been granted a continuance of the trial until August 14, 2006.

4. Counsel needs additional time to file pre-trial motions including, but not

limited to motion concerning the computer analysis referred to in paragraph 2.

**WHEREFORE**, the defendant requests that the court grant a continuance of fourteen (14) days for the defendant's filing of pre-trial motions pursuant to Federal Rule of Criminal Procedure 12(b), and for all other just and proper relief.

DATED this 12<sup>th</sup> day of June, 2006.

Respectfully submitted,

Northern District of Indiana  
Federal Community Defenders, Inc.

By: s/John E. Martin  
John E. Martin  
219 Russell Street, 6<sup>th</sup> Floor  
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**CERTIFICATE OF SERVICE**

I hereby certify that, on June 12, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/CM/ECF system which sent notification of such filing to the following:

**Philip Craig Benson**  
philip.benson@usdoj.gov

and I hereby certify that I have mailed the document by U.S. Postal Service to the following non CM/CM/ECF participants:

s/ John E. Martin